

# **EXHIBIT AD**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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*This document relates to:*

*Thomas E. Burnett, Sr., et al. v. Al Baraka Investment & Development Corp., et al., Case No. 03-CV-9849 (S.D.N.Y.)*

*Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 1:02-6977 (S.D.N.Y.)*

*Federal Insurance Co., et al. v. Al Qaida, et al., Case No. 03-CV-6978 (S.D.N.Y.)*

*Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al., Case No. 04-CV-05970-UA (S.D.N.Y.)*

*Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., Case No. 04-CV-07279-UA (S.D.N.Y.)*

*New York Marine and General Insurance Co. v. Al Qaida, et al., Case No. 04-CV-6105 (S.D.N.Y.)*

*World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corp., et al., Case No. 04-CV-7280 (S.D.N.Y.)*

**AFFIDAVIT OF ABDULLAH AWAD BINLADIN**

I, Abdullah Awad Binladin, state under penalty of perjury as follows:

1. I was born in Saudi Arabia on 25.07.1382 (Hijra calendar) which corresponds to 1962 (Gregorian calendar). I am a citizen of the Kingdom of Saudi Arabia and reside in Jeddah, Saudi Arabia, where I have been employed as an information technology specialist for approximately five years.

2. My mother was one of the 54 children of Mohammad Awad Binladin. Osama Bin Laden ("Osama") was her half-brother, thus making him my half-uncle. I used to meet Osama occasionally at family gatherings, but I have not seen or communicated with him in approximately fifteen years.



3. Although I lived in Falls Church, Virginia for several years, I left the United States and moved back to Jeddah, Saudi Arabia in September of 2000, and have maintained my permanent residence there ever since. For several years before my return to Saudi Arabia in 2000, I was an administrative officer at the Saudi Arabian Embassy, and worked full time in various information technology roles for entities associated with the Embassy.

4. Contrary to the Plaintiffs' allegations, I was already living in Saudi Arabia on September 11, 2001; I did not "flee" the United States after the September 11 attacks as alleged by the Plaintiffs.

5. My brother, Omar, resided with me in Falls Church, Virginia in the late 1990's while he was enrolled in college in the Washington, D.C. area. The "Omar Binladin" referred to as a defendant in this case is my half-uncle, not my brother. My half-uncle, Omar, never resided with me in the United States. My brother, Omar, who did reside with me, was never a director of Saudi Binladin Group or Mohammed Binladin Organization, nor was he a 1974 graduate of the University of Miami (as Plaintiffs describe the defendant, Omar Binladin).

6. In 1991, I established the World Assembly of Muslim Youth International, Inc. ("WAMY-US"), a Virginia non-profit corporation with its office in northern Virginia. The World Assembly of Muslim Youth ("WAMY") is a worldwide charitable Muslim organization that has its headquarters in Riyadh, Saudi Arabia and that, to the best of my knowledge, has a presence in over 55 countries and an associate membership with over 500 youth organizations worldwide. While I was associated with WAMY-US, I had no knowledge of or involvement in the activities of WAMY's offices in Pakistan, the Balkans, Australia or Asia that Plaintiffs have mentioned in their allegations. When I left the United States in late 2000, I had no further association with or responsibility for WAMY-US, and my successor was appointed by WAMY.



7. My work for WAMY-US was in a volunteer capacity, as I maintained a full-time job as stated in Paragraph 3 above. While I was associated with WAMY-US, I represented the organization at various sponsored events, such as the Conference for Peace and Cooperation (in conjunction with the United Nations Development Programme); the Discover Islam project (*see* [www.discoverislam.com](http://www.discoverislam.com)) that was designed to promote Islam as a moderate and a non-violent religion and educate people about Islam; and several other United Nations conferences.

8. I have never provided any material support or support of any nature whatsoever to al Qaeda or any other terrorist organization. To my knowledge, during the period I was involved with WAMY-US, that organization had no dealings or association with and provided no support to al Qaeda or any other terrorist organization.

9. In the 1990's three FBI agents called on me at the WAMY-US office and interviewed me regarding my family's ties to Osama. I cooperated fully with the FBI agents during this interview. The U.S. government has never filed any charges against me or seized or frozen any of my accounts. Nor was any such action taken by the U.S. government against WAMY-US during the time I was associated with that organization.

10. From 1991 until in or about 1994, I served on the board of Taibah International Aid Association ("Taibah"), a Muslim charitable organization incorporated in Virginia. During the time I was on the board, to the best of my knowledge Taibah maintained no offices or branches in Bosnia or in any other country besides the United States. Plaintiffs have alleged that Samir Salah and Abdulrahman Alamoudi were officers or directors of Taibah. Neither man was an officer or director of Taibah while I was a member of the board.

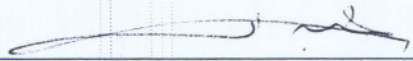


11. I have never provided support to any terrorist, terrorist group, or terrorist activity.

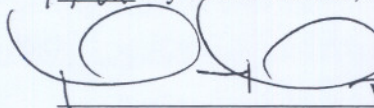
I was appalled by the horrific events of September 11, 2001 and I reject and condemn such violence.

Kingdom of Saudi Arabia  
Western Province  
City of Jeddah  
Consulate General of the  
United States of America

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ABDULLAH AWAD BINLADIN

Sworn to before me this  
19<sup>th</sup> day of November, 2005

  
MARK MCGOVERN  
VICE - CONSUL OF THE  
UNITED STATES OF AMERICA  
Notary Public  
My Commission Expires \_\_\_\_\_ INDEFINITELY